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February 12, 2015

VIA ECF

The Honorable Justice Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square – Room 1106
New York, NY 10007

Re: Sea Trade Maritime Corp. v. Coutsodontis, et al.; Index No. 09 Civ. 488 (LGS) (HBP);
Status Update

Dear Judge Schofield:

We are counsel to Plaintiffs Sea Trade Maritime Corporation (“Sea Trade”) and George Peters (“Peters”) in the above referenced action. We write to provide Your Honor with a status update following yesterday’s discovery conference before Magistrate Judge Pitman. At the conference, Judge Pitman held:

- (1) No sanctions are to be imposed against Defendants Stelios Coutsodontis (“Coutsodontis”) or Francesca Coutsodontis (“Francesca”) (collectively, “the Coutsodontis Defendants”).
- (2) Coutsodontis has until February 13, 2015 to produce documents supporting that the IRS “blessed” an alleged \$3 million “loan” from Coutsodontis to General Maritime.
- (3) The Coutsodontis Defendants have until February 26, 2015 to submit affidavits or declarations indicating what steps each of them took to comply with Judge Pitman’s Discovery Orders.

Respectfully submitted,

/s/ Jason H. Berland
Jason H. Berland
Counsel for Plaintiffs

cc: All Counsel (Via ECF)